

My comments are with respect to the proposal by the FCC to allow spread spectrum transmissions on the 6 meter amateur band. As an amateur radio operator and avid radio control modeler I question the safety of allowing spread spectrum on the 6 meter band. The ARRL band plan suggests "radio remote control" activity to be conducted on 53.1 through 53.8 Mhz in 100 Khz increments (53.1, 53.2, etc). I operate radio control model aircraft in these band segments. Allowing spread spectrum transmissions in this frequency band may compromise safe operations of radio control model aircraft operating in this frequency band.

Model aircraft typically weigh between 5 to 35 pounds and travel at speeds over 60 miles per hour (120 mph is not unusual). Even the lightest models have significant potential to cause injury or damage if control were to be lost. The transmitters utilized for radio control modeling are typically portable in nature, fixed-frequency, FM or PCM, transmitting less than 1 watt through a simple whip antenna. Given the nature of the model aircraft flying, its antenna is very high above the ground, allowing the receiver potentially receive transmissions from transmitters at greater distances than a receiver could receive with an antenna near the ground. Aircraft modeling is typically done at a limited number of sites, due to the necessity to operate the aircraft from open areas. Modelers are easily able to confirm whether or not they could cause interference to another modeler (if they were to transmit) simply by checking the frequencies in use by other modelers at the same model aircraft field. Although good amateur practice is to minimize interference by listening prior to transmitting, it is not practical for an amateur to detect a low power transmitter utilized by a modeler (with an antenna on the ground) at the same distances that the model aircraft's receiver could receive due to its height above the ground.

Fortunately I have not experienced interference on the frequencies I use for modeling on the amateur bands, certainly due to the ARRL's suggested band plan and amateurs' adherence to the plan. At the very least research should be conducted utilizing spread spectrum transmissions and typical radio remote control receivers in the frequency band in question to ascertain whether or not these transmissions would result in harmful interference to radio remote control activities. Until it is proven spread spectrum transmissions on the 6 m band would not interfere with these activities, the FCC should not allow spread spectrum on the 6 m band, or at least not allow spread spectrum between 53.1 and 53.8 Mhz.

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